

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

BINANCE HOLDINGS LIMITED, d/b/a
BINANCE.COM,

Defendant.

NO. CR23-178-RAJ

**UNITED STATES' NOTICE OF
PARTIAL SATISFACTION OF
FORFEITURE MONEY JUDGMENT**

Pursuant to Binance Holdings Limited's Plea Agreement (Dkt. No. 23 ¶14), as amended (Dkt. No. 28), and the Order of Forfeiture (Dkt. No. 31), which was incorporated in the Judgment entered on February 23, 2024 (Dkt. No. 35), the Court forfeited Defendant's interest in the following sums of money:

- A sum of money in the amount of \$1,612,031,763, which is forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), as it reflects the profits Defendant obtained from its commission of Conducting an Unlicensed Money Transmitting Business (Count 2); and
- A sum of money in the amount of \$898,618,825, which is forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), by way of Title 18, United States Code, Section 2461(c), as it reflects the proceeds Defendant obtained from

its commission of Violation of the International Emergency Economic Powers Act by knowingly and willfully causing the exportation, sale, and supply, directly and indirectly, from the United States, and by a United States person, wherever located, of services to Iran, without having first obtained the required authorization or license (Count 3).

The total of the sums of money forfeitable on Counts 2 and 3 is \$2,510,650,558. Dkt. No. 31.

The United States has confirmed with the U.S. Department of the Treasury that on March 21, 2024, Defendant made a \$898,618,825 payment towards the satisfaction of the money judgment for Count 3, pursuant to the payment schedule outlined in the Plea Agreement. Dkt. No. 23 ¶ 24; Dkt. No. 28. Accordingly, the United States hereby gives notice of the partial satisfaction, in the amount of \$898,618,825, towards Defendant's total money judgment forfeiture obligation of \$2,510,650,558.

Iran was designated a state sponsor of terrorism in 1984. By statute, "[a]ll funds . . . forfeited or paid to the United States . . . arising from a violation of any license, order, regulation, or prohibition issued under the International Emergency Economic Powers Act (50 U.S.C. 1701 et seq.) . . . arising from the actions of, or doing business with or acting on behalf of, a state sponsor of terrorism" shall be deposited or transferred to the U.S. Victims of State Sponsored Terrorism Fund. 34 U.S.C. § 20144.

Defendant's forfeiture obligation of \$1,612,031,733 remains outstanding. This remaining forfeiture is due no later than 15 months after sentencing, subject to crediting

///

///

///

///

///

///

1 set forth in paragraphs 14(a) and 16 of the Plea Agreement (Dkt. Nos. 23 & 28).

2
3 DATED: May 24, 2024

4 Respectfully submitted,

5 TESSA M. GORMAN
6 United States Attorney

7 *s/ Jonas Lerman*

8 KARYN S. JOHNSON

9 JONAS LERMAN

Assistant United States Attorneys

United States Attorney's Office

10 700 Stewart Street, Suite 5220

11 Seattle, Washington 98101

12 Phone: (206) 553-2462

13 Fax: (206) 553-6934

karyn.s.johnson@usdoj.gov

14 jonas.lerman@usdoj.gov